



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202-2733

May 25, 2012

**MEMORANDUM**

**SUBJECT:** Second quarterly cap inspection at the San Jacinto River  
Waste Pits superfund site

**FROM:** Valmichael Leos, Federal On-Scene Coordinator  
Emergency Readiness Team (6SF-PE)

**TO:** File

**I. PURPOSE**

This memorandum is to document the observations of the first quarterly cap inspection at the San Jacinto River Waste Pits superfund site (Site) conducted on May 14, 2012. The purpose of the site visit was to inspect the completed removal work which involves a temporary armor cap being used to stabilize the release of dioxin / furan hazardous waste from releasing into the San Jacinto River.

**II. BACKGROUND**

The Site consists of impoundments, approximately 14 acres in size, built in the mid-1960s for the disposal of paper mill wastes and the surrounding areas containing sediments and soils potentially contaminated by the waste materials that had been disposed of in these impoundments. The impoundments are located immediately north of the I-10 bridge and on the western bank of the San Jacinto River in Harris County, Texas. A time-critical removal action was completed in July of 2011 to stabilize the pulp waste material and sediments within the impoundments to prevent the further release of dioxins, furans, and other chemicals into the environment. The removal consisted of placement of an armor rock cap over a geotextile bedding layer and an impermeable geomembrane in some areas.

In accordance with the operations, monitoring, and maintenance (OMM) plan for the Site, the respondents are required to conduct quarterly cap inspections starting January 2012 for the first two years, semi-annually from years three to five, and annually after year five. In addition to the regularly scheduled cap inspections, impromptu inspections may be conducted if a major storm event occurs at or near the site that could adversely affect the protectiveness of the removal action.

The site inspections involve visually inspecting the armor cap for areas of erosion, damage, wear and tear of any exposed geotextile fabric or LLDPE geomembrane liner, topographic surveys, manual probing to ensure the cap maintains the prescribed design thickness, and chemical analysis of surrounding pore water. In addition to land and water based inspections of the cap, visual inspections of the site security and perimeter fencing

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is also conducted. The respondents are required to conduct topographic surveys of the armor cap to ensure a minimum design thickness of the armor cap. If any deficiencies are discovered during the site inspection by either the respondents or the EPA, response procedures for repair have been established in the OMM plan.

### **III. CONCLUSIONS**

On May 14, 2012, EPA OSC Leos conducted a site visit to document observations at the San Jacinto River Waste Pits superfund site. During the site visit it was noted that the Site security fencing visible and intact. Site signage placed along the fencing perimeter and signage placed along the armor cap was visible and intact. There was no evidence of trespassers seen within the fencing of the Site boundaries. The section of the armor cap located above water level was observed to be intact with no areas of cap erosion evident. A review of the respondents second quarterly cap inspection report dated May 17, 2012 which includes a map of topographic surveys completed, have indicated no problematic areas needing cap repair or maintenance. During the site visit, it was documented that various debris had accumulated along the Texas Department of Transportation (TxDOT) right-of-way (ROW) North of I-10 within the site boundary making it difficult to access the site. The debris may pose a significant health and safety concern for future site visit, and should be removed. EPA has requested that the respondents mobilized to the site and conduct periodic removal of any loose debris during future site inspections. The next quarterly cap inspection is scheduled in September 2012.

Enclosure:- Site Inspection Photos

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## Site Inspection Photos 9 of 9

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Photo 1- View of Site perimeter fencing and Site signage South along I-10, West of San Jacinto River



Photo 2- View of Site perimeter fencing South Gate along I-10, West of San Jacinto River

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Photo 3- View of Site perimeter fencing East Gate, East of San Jacinto River



Photo 4- View of Site perimeter fencing Main Gate North along I-10, West of San Jacinto River



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Photo 5- View of armor cap's southern berm and eastern impoundment North of I-10, West of San Jacinto River



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Photo 6- View of eastern impoundment of armor cap North of I-10



Photo 7- View of central berm with both western and eastern impoundments of armor cap North of I-10





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Photo 8- View of western berm and western impoundment of armor cap North of I-10



Photo 9- View of western berm and western impoundment of armor cap North of I-10